

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: MICHAEL LEON BROCK
Debtor

CHAPTER 11
CASE NO. 19-10293-JDW

FIRST AMENDMENT TO PLAN OF REORGANIZATION

COMES NOW Michael Leon Brock (the “Debtor”), and files this his First Amendment (the “Amendment”) to his Chapter 11 Plan of Reorganization (the “Plan”) [DK #217], and respectfully states as follows, to-wit:

1. In the prior Plan before the Court, the Debtor sought to extend the time for payment in full of the mortgage of U.S. Bank/Select Portfolio Servicing, Inc. (the “Bank”) for a point in time that was after the loan fully matures in early 2022.

2. The Bank objected. The Court, in a written Memorandum Opinion and Order [DK #244], sustained the Bank’s objection and directed the Debtor to file an amended plan.

3. This Amendment to the Plan complies with the Court’s directive. Rather than filing an entirely new Plan, since the effect upon creditors and parties-in-interest (other than the Bank) is de minimis, the Debtor simply amends the treatment of the Bank.

4. Accordingly, the amended treatment of Class 5 of the Bank is as follows:

The Debtor shall continue payment of the monthly payments that he has been paying to the Bank since the fall of 2020. Subject to the final paragraph of this amended treatment of the Bank, the Bank’s claim shall mature and be fully due and payable according to its own terms.

This treatment is subject, however, to the Bank affording the Debtor similar treatment that it has extended to other mortgagors who have experienced financial difficulties due to COVID-19. The Bank has not extended that courtesy, that obligation or that formality to the Debtor, despite

Debtor's request therefor. In the event the Debtor and the Bank reach a post-confirmation agreement with respect to mitigation or other modification of the Bank's claims and treatment thereof, Debtor's counsel shall provide a notice to the Court and creditors accordingly.

5. In all other respects, the original Plan remains intact and unaltered.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order confirming the Debtor's Plan, consistent with the original Plan as to all creditors and parties-in-interest with the exception of the Bank, and then confirming the Plan as amended by this First Amendment as to the Bank. Debtor prays for general relief.

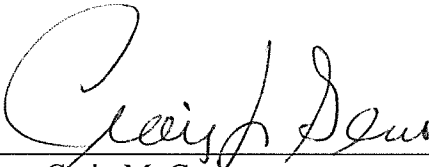
THIS, the 12 day of June, 2021.

Respectfully submitted,

MICHAEL LEON BROCK

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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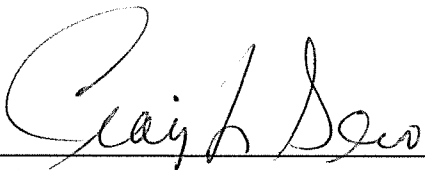
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Sammye S. Tharp, Esq.
Office of the United States Trustee
sammye.s.tharp@usdoj.gov

THIS, the 1st day of June, 2021.



Craig M. Geno